

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

CHIRAG SHAH

Plaintiff,

V.

SOUTHWEST AIRLINES, *et al.*,  
Defendants.

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)Civil Action No. 1:13CV1481 AJT/JFA

**PLAINTIFF’S OBJECTIONS TO DEFENDANT  
SOUTHWEST AIRLINES RULE 26(a)(3) DISCLOSURES**

COMES NOW your Plaintiff, Chirag Shah, by counsel, and submits the following objections to Defendant Southwest Airlines' Rule 26(a)(3) disclosures:

## I. WITNESSES

1. Ava Alley - No objection
2. Elizabeth Behrens - No objection
3. Elain Bohlin - objection as to witness testimony for lack of foundation
4. Ruby Boykin - No objection
5. George Cannon - - No objection to his testifying, subject to such limitations on her testimony as the Court may rule in the Plaintiff's Motion in Limine to be filed.
6. John Chausee - objection as to witness testimony for lack of foundation
7. Brent Harper - objection as to witness testimony for lack of foundation
8. Tim Leonard - objection as to witness testimony for lack of foundation
9. Mary Mortenson - No objection

10. Regina Paschall - No objection to her testifying, subject to such limitations on her testimony as the Court may rule in the Plaintiff's Motion in Limine to be filed.
11. Shannon Ramos - No objection to her testifying, subject to such limitations on her testimony as the Court may rule in the Plaintiff's Motion in Limine to be filed.
12. Susan Saavedra - No objection
13. Chirag Shah - No objection

## **II - EXHIBITS**

1. George Cannon's Flight Operations IR Summary Report - Hearsay
2. Regina Paschall IR # 173349 - Hearsay, Relevance, Conclusory
3. Shannon Ramos IR #173475 - Hearsay, Relevance, Conclusory
4. Jason Hartman IR # 042587 - Hearsay, Relevance, Conclusory
5. FOM Section 21.6.6 - No Objection
6. Southwest Contract of Carriage - No Objection
7. FAM Section 1.20 and 1.2.1 - Relevance
8. Inflight Initial Training Leader's Guide p.5 - Relevance
9. CIRBUS Itinerary - Objected to in part - Bates SW000205 is objected to as hearsay, conclusory
10. Web Form Complaint - No objection
11. April 16, 2013 at 10:50 am Response to your Inquiry - No Objection
12. Email from Lisa Keegaqn to Chirag Shah - No objection
13. Email from Lisa Keegan to Chirag Shah - No objection
14. Email from Lauren to Chirag Shah - No Objection
15. Request for Response - Relevance, Hearsay, Conclusory
16. Request for Reports - No objection
17. Email from Trey Shaw to Deborah Edwards, et al (April 30, 2013) - No objection
18. Email from Elise May to Trey Shaw (April 30, 2013) - No objection
19. Email from Ted Thornton to Trey Shaw (May 3, 2013)- Hearsay, Relevance, Conclusory
20. SR213659802352 Communications - No objection

21. May 16, 2013 3:09 pm Email from Elizabeth Behrens - No objection
22. MWAA Police Report - No objection
23. Policy Concerning Harassment, etc - Relevance
24. Southwest Airlines Safety & Security Commitment - Relevance
25. Cabin Diagram - No objection
26. Expert report of Tim Leonard - Relevance, lack of foundation, Hearsay
27. Expert Report of Brent Harper - Relevance, lack of foundation, Hearsay
28. Expert Report of John Chaussee - Relevance, lack of foundation, Hearsay
29. TSA Layers of Security Graphic - Relevance, lack of foundation, Hearsay

CHIRAG SHAH  
By Counsel

/s/

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**CERTIFICATE OF SERVICE**

I certify that on the 30th day of June, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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